

STATE OF CONNECTICUT  
APPELLATE COURT

DOCKET NO. A.C. 45401 :  
ERICA LAFFERTY, ET AL :  
V. :  
ALEX EMRIC JONES, ET AL : APRIL 25, 2022

**NOTICE AND SUGGESTION OF BANKRUPTCY**

The Defendants – Infowars, LLC; Infowars Health, LLC; and Prison Planet TV, LLC – in the above referenced matters, by their undersigned attorneys, respectfully represent as follows:

1. On April 18, 2022, the Defendants – Infowars, LLC; Infowars Health, LLC; and Prison Planet TV, LLC – filed Voluntary Petitions in the United States Bankruptcy Court for the Southern District of Texas, seeking relief pursuant to Chapter 11 of Title 11 of the United States Code, styled *InfoW, LLC*, Case No. 22-60020; *IWHealth, LLC*, Case No. 2260021; and *Prison Planet TV, LLC*, Case No. 22-60022. True and accurate copies of the three petitions are attached as **Exhibits A, B, and C** hereto.

2. As a result of the aforementioned bankruptcy filings, all proceedings in this case are stayed pursuant to the automatic stay provisions of 11 U.S.C. § 362.

3. Pursuant to Practice Book § 14-1, an affidavit setting forth the information required by § 14-1 is attached hereto as **Exhibit D**.

Dated: April 25, 2022

Respectfully Submitted,

BY: /s/ Norman A. Pattis /s/  
/s/ Cameron L. Atkinson /s/  
Norman A. Pattis  
Cameron L. Atkinson  
PATTIS & SMITH, LLC  
Juris No. 423934  
383 Orange Street  
New Haven, CT 06511  
V: 203-393-3017 F: 203-393-9745  
[npattis@pattisandsmith.com](mailto:npattis@pattisandsmith.com)  
[catkinson@pattisandsmith.com](mailto:catkinson@pattisandsmith.com)

## **CERTIFICATION**

This is to certify that a copy of the foregoing has been emailed and/or mailed, this day, postage prepaid, to all counsel and pro se appearances as follows:

**For Genesis Communications Network, Inc.:**

Mario Kenneth Cerame, Esq.  
Brignole & Bush LLC  
73 Wadsworth Street  
Hartford, CT 06106

**For Plaintiffs:**

Alinor C. Sterling, Esq.  
Christopher M. Mattei, Esq.  
Matthew S. Blumenthal, Esq.  
KOSKOFF KOSKOFF & BIEDER  
350 Fairfield Avenue  
Bridgeport, CT 06604

**For Trustee Richard M. Coan**

Eric Henzy, Esq.  
ZEISLER & ZEISLER P.C.  
10 MIDDLE STREET  
15TH FLOOR  
BRIDGEPORT, CT 06604

/s/ Cameron L. Atkinson /s/  
Cameron L. Atkinson, Esq.

# **Exhibit A**

**Fill in this information to identify the case:**

United States Bankruptcy Court for the:

Southern District of Texas  
(State)Case number (if known): \_\_\_\_\_ Chapter 11☐ Check if this is an amended filing**Official Form 201****Voluntary Petition for Non-Individuals Filing for Bankruptcy**

04/22

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and the case number (if known). For more information, a separate document, *Instructions for Bankruptcy Forms for Non-Individuals*, is available.

1. Debtor's name InfoW, LLC2. All other names debtor used in the last 8 years InfoWars, LLC

Include any assumed names, trade names, and *doing business* as names

3. Debtor's federal Employer Identification Number (EIN) 46 - 4546916 \_ \_ \_ \_4. Debtor's address **Principal place of business** **Mailing address, if different from principal place of business**5606 N. Navarro STE 300-W  
Number Street

Number Street

PO Box 1819  
P.O. BoxVictoria, TX 77904  
City State ZIP CodeHouston, TX 77251-1819  
City State ZIP Code**Location of principal assets, if different from principal place of business**Victoria  
County

Number Street

City State ZIP Code

5. Debtor's website (URL) \_\_\_\_\_

Debtor	InfoW, LLC <small>Name</small>	Case number (if known) _____
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**6. Type of debtor**

☒ Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP))

☐ Partnership (excluding LLP)

☐ Other. Specify: \_\_\_\_\_

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**7. Describe debtor's business**

*A. Check one:*

☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))

☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))

☐ Railroad (as defined in 11 U.S.C. § 101(44))

☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))

☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))

☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))

☒ None of the above

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*B. Check all that apply:*

☐ Tax-exempt entity (as described in 26 U.S.C. § 501)

☐ Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. § 80a-3)

☐ Investment advisor (as defined in 15 U.S.C. § 80b-2(a)(11))

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*C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor. See <http://www.uscourts.gov/four-digit-national-association-naics-codes>.*

5331                

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**8. Under which chapter of the Bankruptcy Code is the debtor filing?**

*Check one:*

☐ Chapter 7

☐ Chapter 9

☒ Chapter 11. *Check all that apply:*

☐ Debtor's aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$3,024,725 (amount subject to adjustment on 4/01/25 and every 3 years after that).

☒ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D). If the debtor is a small business debtor, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if all of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).

☒ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D), and it chooses to proceed under Subchapter V of Chapter 11.

☐ A plan is being filed with this petition.

☐ Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).

☐ The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the *Attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11* (Official Form 201A) with this form.

☐ The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.

☐ Chapter 12

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**9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?**

☒ No

☐ Yes. District \_\_\_\_\_ When \_\_\_\_\_ Case number \_\_\_\_\_  
MM / DD / YYYY

If more than 2 cases, attach a separate list. District \_\_\_\_\_ When \_\_\_\_\_ Case number \_\_\_\_\_  
MM / DD / YYYY

Debtor InfoW, LLC Case number (if known) \_\_\_\_\_  
Name

**10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor?**

☐ No

☒ Yes. Debtor IW Health, LLC Relationship Affiliate  
 District Southern District of Texas When 04/18/2022  
MM / DD / YYYY  
 Case number, if known \_\_\_\_\_

List all cases. If more than 1, attach a separate list.

**11. Why is the case filed in this district?**

Check all that apply:

- ☒ Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.
- ☐ A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

**12. Does the debtor own or have possession of any real property or personal property that needs immediate attention?**

☒ No

☐ Yes. Answer below for each property that needs immediate attention. Attach additional sheets if needed.

**Why does the property need immediate attention?** (Check all that apply.)

- ☐ It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety.  
 What is the hazard? \_\_\_\_\_
- ☐ It needs to be physically secured or protected from the weather.
- ☐ It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).
- ☐ Other \_\_\_\_\_

**Where is the property?**

Number \_\_\_\_\_ Street \_\_\_\_\_  
 \_\_\_\_\_  
 City \_\_\_\_\_ State ZIP Code \_\_\_\_\_

**Is the property insured?**

☐ No

☐ Yes. Insurance agency \_\_\_\_\_  
 Contact name \_\_\_\_\_  
 Phone \_\_\_\_\_

**Statistical and administrative information**

**13. Debtor's estimation of available funds**

Check one:

- ☐ Funds will be available for distribution to unsecured creditors.
- ☐ After any administrative expenses are paid, no funds will be available for distribution to unsecured creditors.

**14. Estimated number of creditors**

- |  |  |  |
|--|--|--|
| <input checked="" type="checkbox"/> 1-49 | <input type="checkbox"/> 1,000-5,000   | <input type="checkbox"/> 25,001-50,000     |
| <input type="checkbox"/> 50-99           | <input type="checkbox"/> 5,001-10,000  | <input type="checkbox"/> 50,001-100,000    |
| <input type="checkbox"/> 100-199         | <input type="checkbox"/> 10,001-25,000 | <input type="checkbox"/> More than 100,000 |
| <input type="checkbox"/> 200-999         |  |  |

Debtor InfoW, LLC Case number (if known) \_\_\_\_\_  
Name

**15. Estimated assets**

- ☒ \$0-\$50,000      ☐ \$1,000,001-\$10 million      ☐ \$500,000,001-\$1 billion  
☐ \$50,001-\$100,000      ☐ \$10,000,001-\$50 million      ☐ \$1,000,000,001-\$10 billion  
☐ \$100,001-\$500,000      ☐ \$50,000,001-\$100 million      ☐ \$10,000,000,001-\$50 billion  
☐ \$500,001-\$1 million      ☐ \$100,000,001-\$500 million      ☐ More than \$50 billion

**16. Estimated liabilities**

- ☐ \$0-\$50,000      ☒ \$1,000,001-\$10 million      ☐ \$500,000,001-\$1 billion  
☐ \$50,001-\$100,000      ☐ \$10,000,001-\$50 million      ☐ \$1,000,000,001-\$10 billion  
☐ \$100,001-\$500,000      ☐ \$50,000,001-\$100 million      ☐ \$10,000,000,001-\$50 billion  
☐ \$500,001-\$1 million      ☐ \$100,000,001-\$500 million      ☐ More than \$50 billion

**Request for Relief, Declaration, and Signatures**

**WARNING --** Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

**17. Declaration and signature of authorized representative of debtor**

The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.

I have been authorized to file this petition on behalf of the debtor.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 04/18/2022  
MM / DD / YYYY

**x**   
 Signature of authorized representative of debtor

W. Marc Schwartz  
 Printed name

Title Chief Restructuring Officer

**18. Signature of attorney**

**x** /s/ Kyung S. Lee

Signature of attorney for debtor

Date 04/18/2022  
MM / DD / YYYY

Kyung S. Lee  
 Printed name

Parkins Lee & Rubio LLP  
 Firm name

700 Milam Street, STE 1300  
 Number Street

Houston, TX, 77002  
 City

State ZIP Code

(713) 715-1660  
 Contact phone

klee@parkinslee.com  
 Email address

121228400  
 Bar number

Texas  
 State



**CONTINUATION SHEET TO Q.10 OF VOLUNTARY PETITION**

<i>Debtor</i>	<i>District</i>	<i>Relationship</i>	<i>Date of Filing</i>	<i>Case Number</i>
Prison Planet TV, LLC	S.D. of Texas	Affiliate	04/18/2022	Unknown

Fill in this information to identify the case:

Debtor name InfoW, LLC

United States Bankruptcy Court for the:

Southern District of Texas

Case number (if known): \_\_\_\_\_

☐ Check if this is an amended filing**Official Form 204****Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders****12/15**

A list of creditors holding the 20 largest unsecured claims must be filed in a Chapter 11 or Chapter 9 case. Include claims which the debtor disputes. Do not include claims by any person or entity who is an *insider*, as defined in 11 U.S.C. § 101(31). Also, do not include claims by secured creditors, unless the unsecured claim resulting from inadequate collateral value places the creditor among the holders of the 20 largest unsecured claims.

	Name of creditor and complete mailing address, including zip code	Name, telephone number, and email address of creditor contact	Nature of the claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of unsecured claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
					Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
1	Brennan Gilmore c/o Civil Rights Clinic ATTN: Andrew Mendrala 600 New Jersey Avenue, NW Washington, DC 20001	Andrew Mendrala (202) 662-9065 andrew.mendrala@georgetow.n.edu	Litigation claim	Disputed Unliquidated			\$50,000
2	Carlee Soto-Parisi c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 336-4421 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown
3	Christopher Sadowski c/o Copycat Legal PLLC 3111 N. University Drive Ste. 301 Coral Springs, FL 33065	Daniel DeSouza (877) 437-6228 dan@copycatlegal.com	Potential lawsuit for Copyright Infringement	Contingent Disputed Unliquidated			\$90,000.00
4	Dona Soto c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 336-4421 cmattei@koskoff.com	Litigation claim				Unknown
5	Erica Lafferty c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 336-4421 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown
6	Francine Wheeler c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 336-4421 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown
7	Ian Hockley c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 336-4421 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown
8	Jacqueline Barden c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 336-4421 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown

Debtor InfoW, LLC

Case number (if known) \_\_\_\_\_

Name \_\_\_\_\_

	Name of creditor and complete mailing address, including zip code	Name, telephone number, and email address of creditor contact	Nature of the claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of unsecured claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
					Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
9	Jennifer Hensel c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 336-4421 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown
10	Jeremy Richman c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 336-4421 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown
11	Jillian Soto c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 336-4421 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown
12	Leonard Pozner c/o Kaster Lynch Farrar & Ball LLP 1117 Herkimer Houston, TX 77008	Mark Bankston (713) 221-8330 mark@fbtrial.com	Litigation claim	Disputed Unliquidated			Unknown
13	Marcel Fontaine c/o Kaster Lynch Farrar & Ball LLP 1117 Herkimer Houston, TX 77008	Mark Bankston (713) 221-8300 mark@fbtrial.com	Litigation claim	Disputed Unliquidated			Unknown
14	Mark Barden c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Mark Bankston (713) 221-8300 mark@fbtrial.com	Litigation claim	Disputed Unliquidated			Unknown
15	Neil Heslin c/o Kaster Lynch Farrar & Ball LLP 1117 Herkimer Houston, TX 77008	Mark Bankston (713) 221-8300 mark@fbtrial.com	Litigation claim	Disputed Unliquidated			Unknown
16	Nicole Hockley c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 336-4421 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown
17	Robert Parker c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 221-8300 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown
18	Scarlett Lewis c/o Kaster Lynch Farrar & Ball, LLP 1117 Herkimer Street Houston, TX 77008	Mark Bankston (713) 221-8300 Mark@fbtrial.com	Litigation claim	Disputed Unliquidated			Unknown
19	Veronique De La Rosa c/o Kaster Lynch Farrar & Ball LLP 1117 Herkimer Houston, TX 77008	Mark Bankston (713) 221-8300 mark@fbtrial.com	Litigation claim	Disputed Unliquidated			Unknown
20	William Sherlach c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 221-8300 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
VICTORIA DIVISION**

In re:	)	
	)	
INFOW, LLC	)	Case No. 22 - _____
	)	
Debtor.	)	Chapter 11 (Subchapter V)

**LIST OF EQUITY SECURITY HOLDERS**

<i>Registered Name of Holder of Security, Last Known Address or Place of Business</i>	<i>Class of Security</i>	<i>Number Registered</i>	<i>Kind of Interest</i>
Robert Dew, Trustee 3019 Alvin Devane Blvd., Suite 300 Austin, TX 78741	Common Equity	100%	Membership Interests

**DECLARATION UNDER PENALTY OF PERJURY  
ON BEHALF OF A CORPORATION OR PARTNERSHIP**

I, the Chief Restructuring Officer of the limited liability company named as the debtor in this case, declare under penalty of perjury that I have read the foregoing list and that it is true and correct to the best of my information and belief.

Date: 04/18/2022

Signature:   
W. Marc Schwartz

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
VICTORIA DIVISION**

In re:	)	
	)	
INFOW, LLC	)	Case No. 22 - _____
	)	
Debtor.	)	Chapter 11 (Subchapter V)

**DECLARATION OF W. MARC SCHWARTZ REGARDING  
BANKRUPTCY CODE § 1116(1) REQUIREMENTS**

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I, W. Marc Schwartz, hereby declare as follows:

1. My name is W. Marc Schwartz.
2. I am a founder of Schwartz & Associates, LLC (“SALLC”). SALLC has its principal offices at 712 Main Street, Suite 1830, Houston, Texas. SALLC has been engaged in business since 2019. The primary business of SALLC is bankruptcy and financial restructuring consulting, serving as financial/economic experts in civil litigation matters and, serving as court appointed receivers in federal and state court matters. The firm is also licensed as an Investigations Company by the Texas Department of Public Safety.
3. SALLC’s services include financial forensics, supervising business operations as a trustee, examiner with expanded powers or receiver, valuing business assets and income tax related services. My firm represents individuals, companies and courts in a variety of assignments including as Chief Restructuring Officers, financial advisers, trustees and examiners in bankruptcy matters; working as testifying or consulting experts on damages and economic issues for parties involved in litigation and as a special master for courts where litigation matters are pending; serving as court appointed receivers in state and federal courts.

4. I earned a Bachelor of Arts degree from Princeton University and a Master's in Business Administration degree from the University of Chicago Booth School of Business. I am licensed in Texas as a Certified Public Accountant, Certified in Financial Forensics by the American Institute of Certified Public Accountants, a Certified Fraud Examiner, and a Licensed Private Investigator.

5. I have extensive experience serving as a fiduciary in bankruptcy cases as either a Chapter 11 Trustee, a Chief Restructuring Officer, or an Examiner with expanded powers. I have also acted as a receiver over several individuals and entities under state law.

6. I was retained as of April \_\_, 2022 by the Trustee of the Litigation Settlement Trust formed by InfoW, Inc. ("InfoW"), IWHealth, LLC ("IWH") and Prison Planet TV, LCC ("PTV", and together with the InfoW, IWH, and PTV, the "Debtors") as the Debtors' Chief Restructuring Officer.


7. Since my retention, I have met with Bob Roe, a CPA retained to delve into the books of account of various entities affiliated with the Debtors and assist those entities to prepare accurate financials statements which could be relied upon by the reader to accurately reflect the financial condition and activities of the entities. I have also met with counsel for the Debtors and Mr. Jones to obtain an understanding of the Debtors' operations. I have also reviewed lists of assets owned by the Debtors.

8. I have learned that the Debtor's have no purpose other than to hold assets which may be used by other entities. They undertake no business activities, they do not sell, rent or lease to others anything. Their assets do not generate any income for them. They have no bank accounts and do not pay money to anyone for any reason. They have no debt or other liabilities other than those related to pending or potential litigation. For

these reasons, they have no financial statements or books of account and they do not file income tax returns.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: 04/18/2022

By:   
W. Marc Schwartz

**WRITTEN CONSENT OF THE MEMBERS OF INFOW, LLC**

The undersigned, comprising all of the members of InfoW, LLC (the "Company"), a Texas limited liability company, hereby declares that, upon execution of this document, they consent and resolve as follows:

RESOLVED, that the Company is authorized to file a petition for chapter 11 bankruptcy relief;

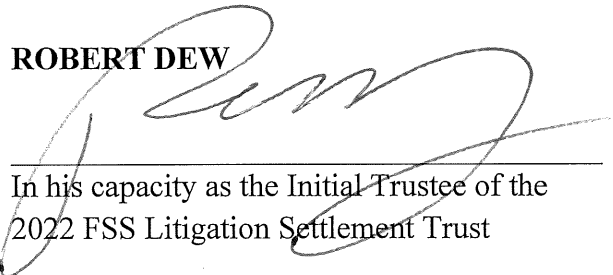
RESOLVED FURTHER, that W. Marc Schwartz in his role as a consultant to the Company serving as Chief Restructuring Officer is authorized, empowered, and directed to take all appropriate actions for, in the name of, and on behalf of the Company in connection with any chapter 11 case authorized hereby, including the preparation, execution, and filing of a petition for chapter 11 relief; and

RESOLVED FURTHER; that the Company is authorized to continue the employment of the CRO and to retain any professionals and advisors to the extent necessary or useful in any chapter 11 case authorized hereby.

IN WITNESS WHEREOF, the undersigned, being all of the members of the Company, have executed this Consent.

Dated: April 14, 2022

**ROBERT DEW**

  
In his capacity as the Initial Trustee of the  
2022 FSS Litigation Settlement Trust



# **Exhibit B**

**Fill in this information to identify the case:**

United States Bankruptcy Court for the:

Southern District of Texas  
(State)Case number (if known): \_\_\_\_\_ Chapter 11☐ Check if this is an amended filing**Official Form 201****Voluntary Petition for Non-Individuals Filing for Bankruptcy**

04/22

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and the case number (if known). For more information, a separate document, *Instructions for Bankruptcy Forms for Non-Individuals*, is available.

1. Debtor's name IWHealth, LLC2. All other names debtor used in the last 8 years InfoWars Health, LLC

Include any assumed names, trade names, and *doing business* as names

3. Debtor's federal Employer Identification Number (EIN) \_\_\_\_\_

4. Debtor's address **Principal place of business** **Mailing address, if different from principal place of business**5606 N. Navarro STE 300-W

Number Street

Number Street

PO Box 1819

P.O. Box

Victoria, TX 77904

City State ZIP Code

Houston, TX 77251-1819

City State ZIP Code

**Location of principal assets, if different from principal place of business**Victoria

County

Number Street

City State ZIP Code

5. Debtor's website (URL) \_\_\_\_\_

Debtor <u>IWHealth, LLC</u> <small>Name</small>	Case number (if known) _____
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**6. Type of debtor**

☒ Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP))  
☐ Partnership (excluding LLP)  
☐ Other. Specify: \_\_\_\_\_

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**7. Describe debtor's business**

A. Check one:

☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))  
☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))  
☐ Railroad (as defined in 11 U.S.C. § 101(44))  
☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))  
☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))  
☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))  
☒ None of the above

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B. Check all that apply:

☐ Tax-exempt entity (as described in 26 U.S.C. § 501)  
☐ Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. § 80a-3)  
☐ Investment advisor (as defined in 15 U.S.C. § 80b-2(a)(11))

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C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor. See <http://www.uscourts.gov/four-digit-national-association-naics-codes>.

5331 \_ \_ \_

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**8. Under which chapter of the Bankruptcy Code is the debtor filing?**

Check one:

☐ Chapter 7  
☐ Chapter 9  
☒ Chapter 11. Check all that apply:

☐ Debtor's aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$3,024,725 (amount subject to adjustment on 4/01/25 and every 3 years after that).  
☒ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D). If the debtor is a small business debtor, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if all of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).  
☒ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D), and it chooses to proceed under Subchapter V of Chapter 11.  
☐ A plan is being filed with this petition.  
☐ Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).  
☐ The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the *Attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11* (Official Form 201A) with this form.  
☐ The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.

☐ Chapter 12

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**9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?**

☒ No  
☐ Yes. District \_\_\_\_\_ When \_\_\_\_\_ Case number \_\_\_\_\_  
MM / DD / YYYY  
 District \_\_\_\_\_ When \_\_\_\_\_ Case number \_\_\_\_\_  
MM / DD / YYYY

If more than 2 cases, attach a separate list.

Debtor IWHealth, LLC Case number (if known) \_\_\_\_\_  
Name

**10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor?**

☐ No

☒ Yes. Debtor InfoW, LLC Relationship Affiliate  
 District Southern District of Texas When 04/18/2022  
MM / DD / YYYY  
 Case number, if known \_\_\_\_\_

List all cases. If more than 1, attach a separate list.

**11. Why is the case filed in this district?**

Check all that apply:

- ☒ Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.
- ☐ A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

**12. Does the debtor own or have possession of any real property or personal property that needs immediate attention?**

☒ No

☐ Yes. Answer below for each property that needs immediate attention. Attach additional sheets if needed.

**Why does the property need immediate attention?** (Check all that apply.)

- ☐ It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety.  
 What is the hazard? \_\_\_\_\_
- ☐ It needs to be physically secured or protected from the weather.
- ☐ It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).
- ☐ Other \_\_\_\_\_

**Where is the property?**

Number \_\_\_\_\_ Street \_\_\_\_\_  
 \_\_\_\_\_  
 City \_\_\_\_\_ State ZIP Code \_\_\_\_\_

**Is the property insured?**

- ☐ No
- ☐ Yes. Insurance agency \_\_\_\_\_  
 Contact name \_\_\_\_\_  
 Phone \_\_\_\_\_

**Statistical and administrative information**

**13. Debtor's estimation of available funds**

Check one:

- ☐ Funds will be available for distribution to unsecured creditors.
- ☐ After any administrative expenses are paid, no funds will be available for distribution to unsecured creditors.

**14. Estimated number of creditors**

- |  |  |  |
|--|--|--|
| <input checked="" type="checkbox"/> 1-49 | <input type="checkbox"/> 1,000-5,000   | <input type="checkbox"/> 25,001-50,000     |
| <input type="checkbox"/> 50-99           | <input type="checkbox"/> 5,001-10,000  | <input type="checkbox"/> 50,001-100,000    |
| <input type="checkbox"/> 100-199         | <input type="checkbox"/> 10,001-25,000 | <input type="checkbox"/> More than 100,000 |
| <input type="checkbox"/> 200-999         |  |  |

Debtor IWHealth, LLC  
Name

Case number (if known) \_\_\_\_\_

## 15. Estimated assets

- |   |  |  |
|---|--|--|
| <input type="checkbox"/> \$0-\$50,000                     | <input type="checkbox"/> \$1,000,001-\$10 million    | <input type="checkbox"/> \$500,000,001-\$1 billion     |
| <input type="checkbox"/> \$50,001-\$100,000               | <input type="checkbox"/> \$10,000,001-\$50 million   | <input type="checkbox"/> \$1,000,000,001-\$10 billion  |
| <input type="checkbox"/> \$100,001-\$500,000              | <input type="checkbox"/> \$50,000,001-\$100 million  | <input type="checkbox"/> \$10,000,000,001-\$50 billion |
| <input checked="" type="checkbox"/> \$500,001-\$1 million | <input type="checkbox"/> \$100,000,001-\$500 million | <input type="checkbox"/> More than \$50 billion        |

## 16. Estimated liabilities

- |  |  |  |
|--|--|--|
| <input type="checkbox"/> \$0-\$50,000          | <input checked="" type="checkbox"/> \$1,000,001-\$10 million | <input type="checkbox"/> \$500,000,001-\$1 billion     |
| <input type="checkbox"/> \$50,001-\$100,000    | <input type="checkbox"/> \$10,000,001-\$50 million           | <input type="checkbox"/> \$1,000,000,001-\$10 billion  |
| <input type="checkbox"/> \$100,001-\$500,000   | <input type="checkbox"/> \$50,000,001-\$100 million          | <input type="checkbox"/> \$10,000,000,001-\$50 billion |
| <input type="checkbox"/> \$500,001-\$1 million | <input type="checkbox"/> \$100,000,001-\$500 million         | <input type="checkbox"/> More than \$50 billion        |

**Request for Relief, Declaration, and Signatures**

**WARNING --** Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

## 17. Declaration and signature of authorized representative of debtor

The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.

I have been authorized to file this petition on behalf of the debtor.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 04/18/2022  
MM / DD / YYYY

x

  
Signature of authorized representative of debtor

W. Marc Schwartz

Printed name

Title Chief Restructuring Officer

## 18. Signature of attorney

x

/s/ Kyung S. Lee

Signature of attorney for debtor

Date 04/18/2022

MM / DD / YYYY

Kyung S. Lee

Printed name

Parkins Lee & Rubio LLP

Firm name

700 Milam Street, STE 1300

Number Street

Houston, TX, 77002

City

State

ZIP Code

(713) 715-1660

Contact phone

klee@parkinslee.com

Email address

121228400

Bar number

Texas

State

**CONTINUATION SHEET TO Q.10 OF VOLUNTARY PETITION**

<i>Debtor</i>	<i>District</i>	<i>Relationship</i>	<i>Date of Filing</i>	<i>Case Number</i>
Prison Planet TV, LLC	S.D. of Texas	Affiliate	04/18/2022	Unknown

Fill in this information to identify the case:

Debtor name IWHealth, LLC

United States Bankruptcy Court for the:

Southern District of Texas

Case number (if known): \_\_\_\_\_

☐ Check if this is an amended filing**Official Form 204****Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders**

12/15

A list of creditors holding the 20 largest unsecured claims must be filed in a Chapter 11 or Chapter 9 case. Include claims which the debtor disputes. Do not include claims by any person or entity who is an *insider*, as defined in 11 U.S.C. § 101(31). Also, do not include claims by secured creditors, unless the unsecured claim resulting from inadequate collateral value places the creditor among the holders of the 20 largest unsecured claims.

	Name of creditor and complete mailing address, including zip code	Name, telephone number, and email address of creditor contact	Nature of the claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of unsecured claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
					Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
1	Carlee Soto-Parisi c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 336-4421 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown
2	Carlos Soto c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 662-9065 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown
3	Dona Soto c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 662-9065 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown
4	Erica Lafferty c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 662-9065 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown
5	Francine Wheeler c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 662-9065 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown
6	Ian Hockley c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 662-9065 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown
7	Jacqueline Barden c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 662-9065 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown
8	Jennifer Hensel c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 662-9065 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown

Debtor IWHealth, LLC

Case number (if known) \_\_\_\_\_

Name

	Name of creditor and complete mailing address, including zip code	Name, telephone number, and email address of creditor contact	Nature of the claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of unsecured claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
					Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
9	Jeremy Richman c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 662-9065 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown
10	Jillian Soto c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 662-9065 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown
11	Mark Barden c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 662-9065 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown
12	Nicole Hockley c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 662-9065 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown
13	Robert Parker c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 662-9065 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown
14	William Sherlach c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 662-9065 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown
15	William Aldenberg c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 662-9065 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown
16							
17							
18							
19							
20							



**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
VICTORIA DIVISION**

In re:	)	
	)	
IWHEALTH, LLC	)	Case No. 22 - _____
	)	
Debtor.	)	Chapter 11 (Subchapter V)

**LIST OF EQUITY SECURITY HOLDERS**

<i>Registered Name of Holder of Security, Last Known Address or Place of Business</i>	<i>Class of Security</i>	<i>Number Registered</i>	<i>Kind of Interest</i>
Robert Dew, Trustee 3019 Alvin Devane Blvd., Suite 300 Austin, TX 78741	Common Equity	100%	Membership Interests

**DECLARATION UNDER PENALTY OF PERJURY  
ON BEHALF OF A CORPORATION OR PARTNERSHIP**

I, the Chief Restructuring Officer of the limited liability company named as the debtor in this case, declare under penalty of perjury that I have read the foregoing list and that it is true and correct to the best of my information and belief.

Date: 04/18/2022

Signature:   
W. Marc Schwartz

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
VICTORIA DIVISION**

In re:	)	
	)	
IWHEALTH, LLC	)	Case No. 22 - _____
	)	
Debtor.	)	Chapter 11 (Subchapter V)

**DECLARATION OF W. MARC SCHWARTZ REGARDING  
BANKRUPTCY CODE § 1116(1) REQUIREMENTS**

---

I, W. Marc Schwartz, hereby declare as follows:

1. My name is W. Marc Schwartz.
2. I am a founder of Schwartz & Associates, LLC ("SALLC"). SALLC has its principal offices at 712 Main Street, Suite 1830, Houston, Texas. SALLC has been engaged in business since 2019. The primary business of SALLC is bankruptcy and financial restructuring consulting, serving as financial/economic experts in civil litigation matters and, serving as court appointed receivers in federal and state court matters. The firm is also licensed as an Investigations Company by the Texas Department of Public Safety.
3. SALLC's services include financial forensics, supervising business operations as a trustee, examiner with expanded powers or receiver, valuing business assets and income tax related services. My firm represents individuals, companies and courts in a variety of assignments including as Chief Restructuring Officers, financial advisers, trustees and examiners in bankruptcy matters; working as testifying or consulting experts on damages and economic issues for parties involved in litigation and as a special master for courts where litigation matters are pending; serving as court appointed receivers in state and federal courts.

4. I earned a Bachelor of Arts degree from Princeton University and a Master's in Business Administration degree from the University of Chicago Booth School of Business. I am licensed in Texas as a Certified Public Accountant, Certified in Financial Forensics by the American Institute of Certified Public Accountants, a Certified Fraud Examiner, and a Licensed Private Investigator.

5. I have extensive experience serving as a fiduciary in bankruptcy cases as either a Chapter 11 Trustee, a Chief Restructuring Officer, or an Examiner with expanded powers. I have also acted as a receiver over several individuals and entities under state law.

6. I was retained as of April \_\_, 2022 by the Trustee of the Litigation Settlement Trust formed by InfoW, Inc. ("InfoW"), IWHealth, LLC ("IWH") and Prison Planet TV, LCC ("PTV"), and together with the InfoW, IWH, and PTV, the "Debtors") as the Debtors' Chief Restructuring Officer.

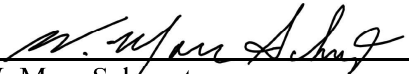
7. Since my retention, I have met with Bob Roe, a CPA retained to delve into the books of account of various entities affiliated with the Debtors and assist those entities to prepare accurate financials statements which could be relied upon by the reader to accurately reflect the financial condition and activities of the entities. I have also met with counsel for the Debtors and Mr. Jones to obtain an understanding of the Debtors' operations. I have also reviewed lists of assets owned by the Debtors.

8. I have learned that the Debtor's have no purpose other than to hold assets which may be used by other entities. They undertake no business activities, they do not sell, rent or lease to others anything. Their assets do not generate any income for them. They have no bank accounts and do not pay money to anyone for any reason. They have no debt or other liabilities other than those related to pending or potential litigation. For

these reasons, they have no financial statements or books of account and they do not file income tax returns.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: 04/18/2022

By:   
W. Marc Schwartz

**WRITTEN CONSENT OF THE MEMBERS OF IWHEALTH, LLC**

The undersigned, comprising all of the members of IWHealth, LLC (the "Company"), a Texas limited liability company, hereby declares that, upon execution of this document, they consent and resolve as follows:

RESOLVED, that the Company is authorized to file a petition for chapter 11 bankruptcy relief;

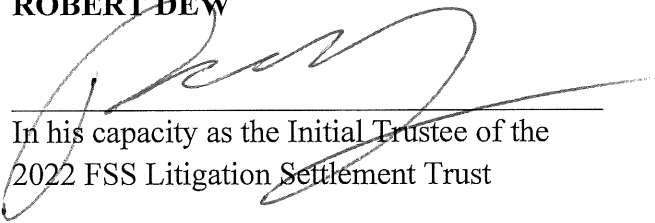
RESOLVED FURTHER, that W. Marc Schwartz in his role as a consultant to the Company serving as Chief Restructuring Officer is authorized, empowered, and directed to take all appropriate actions for, in the name of, and on behalf of the Company in connection with any chapter 11 case authorized hereby, including the preparation, execution, and filing of a petition for chapter 11 relief; and

RESOLVED FURTHER; that the Company is authorized to continue the employment of the CRO and to retain any professionals and advisors to the extent necessary or useful in any chapter 11 case authorized hereby.

IN WITNESS WHEREOF, the undersigned, being all of the members of the Company, have executed this Consent.

Dated: April 14, 2022

**ROBERT DEW**

  
In his capacity as the Initial Trustee of the  
2022 FSS Litigation Settlement Trust

# **Exhibit C**

**Fill in this information to identify the case:**

United States Bankruptcy Court for the:

Southern District of Texas  
(State)Case number (if known): \_\_\_\_\_ Chapter 11☐ Check if this is an amended filing**Official Form 201****Voluntary Petition for Non-Individuals Filing for Bankruptcy**

04/22

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and the case number (if known). For more information, a separate document, *Instructions for Bankruptcy Forms for Non-Individuals*, is available.

1. Debtor's name Prison Planet TV, LLC

2. All other names debtor used in the last 8 years

Include any assumed names, trade names, and *doing business* as names

3. Debtor's federal Employer Identification Number (EIN) 26 - 1510005

4. Debtor's address

Principal place of business

Mailing address, if different from principal place of business

5606 N. Navarro STE 300-W

Number Street

Number Street

PO Box 1819

P.O. Box

Victoria, TX 77904

City State ZIP Code

Houston, TX 77251-1819

City State ZIP Code

Location of principal assets, if different from principal place of business

Victoria

County

Number Street

City State ZIP Code

5. Debtor's website (URL) \_\_\_\_\_

Debtor	<u>Prison Planet TV, LLC</u>	Case number (if known) _____
<small>Name</small>		

---

**6. Type of debtor**

☒ Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP))

☐ Partnership (excluding LLP)

☐ Other. Specify: \_\_\_\_\_

---

**7. Describe debtor's business**

A. Check one:

☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))

☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))

☐ Railroad (as defined in 11 U.S.C. § 101(44))

☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))

☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))

☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))

☒ None of the above

---

B. Check all that apply:

☐ Tax-exempt entity (as described in 26 U.S.C. § 501)

☐ Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. § 80a-3)

☐ Investment advisor (as defined in 15 U.S.C. § 80b-2(a)(11))

---

C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor. See <http://www.uscourts.gov/four-digit-national-association-naics-codes>.

5331 \_ \_ \_

---

**8. Under which chapter of the Bankruptcy Code is the debtor filing?**

Check one:

☐ Chapter 7

☐ Chapter 9

☒ Chapter 11. Check all that apply:

☐ Debtor's aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$3,024,725 (amount subject to adjustment on 4/01/25 and every 3 years after that).

☒ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D). If the debtor is a small business debtor, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if all of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).

☒ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D), and it chooses to proceed under Subchapter V of Chapter 11.

☐ A plan is being filed with this petition.

☐ Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).

☐ The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the *Attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11* (Official Form 201A) with this form.

☐ The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.

☐ Chapter 12

---

**9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?**

☒ No

☐ Yes. District \_\_\_\_\_ When \_\_\_\_\_ Case number \_\_\_\_\_

MM / DD / YYYY

If more than 2 cases, attach a separate list.

District \_\_\_\_\_ When \_\_\_\_\_ Case number \_\_\_\_\_

MM / DD / YYYY



Debtor Prison Planet TV, LLC Case number (if known) \_\_\_\_\_  
Name

**10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor?**

☐ No

☒ Yes. Debtor InfoW, LLC Relationship Affiliate  
 District Southern District of Texas When 04/18/2022  
MM / DD / YYYY  
 Case number, if known \_\_\_\_\_

List all cases. If more than 1, attach a separate list.

**11. Why is the case filed in this district?**

Check all that apply:

☒ Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.

☐ A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

**12. Does the debtor own or have possession of any real property or personal property that needs immediate attention?**

☒ No

☐ Yes. Answer below for each property that needs immediate attention. Attach additional sheets if needed.

**Why does the property need immediate attention?** (Check all that apply.)

☐ It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety.

What is the hazard? \_\_\_\_\_

☐ It needs to be physically secured or protected from the weather.

☐ It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).

☐ Other \_\_\_\_\_

**Where is the property?**

Number \_\_\_\_\_ Street \_\_\_\_\_

City \_\_\_\_\_ State ZIP Code \_\_\_\_\_

**Is the property insured?**

☐ No

☐ Yes. Insurance agency \_\_\_\_\_

Contact name \_\_\_\_\_

Phone \_\_\_\_\_

**Statistical and administrative information**

**13. Debtor's estimation of available funds**

Check one:

☐ Funds will be available for distribution to unsecured creditors.

☐ After any administrative expenses are paid, no funds will be available for distribution to unsecured creditors.

**14. Estimated number of creditors**

☒ 1-49

☐ 50-99

☐ 100-199

☐ 200-999

☐ 1,000-5,000

☐ 5,001-10,000

☐ 10,001-25,000

☐ 25,001-50,000

☐ 50,001-100,000

☐ More than 100,000

Debtor Prison Planet TV, LLC Case number (if known) \_\_\_\_\_  
Name

**15. Estimated assets**

- |  |  |  |
|--|--|--|
| <input checked="" type="checkbox"/> \$0-\$50,000 | <input type="checkbox"/> \$1,000,001-\$10 million    | <input type="checkbox"/> \$500,000,001-\$1 billion     |
| <input type="checkbox"/> \$50,001-\$100,000      | <input type="checkbox"/> \$10,000,001-\$50 million   | <input type="checkbox"/> \$1,000,000,001-\$10 billion  |
| <input type="checkbox"/> \$100,001-\$500,000     | <input type="checkbox"/> \$50,000,001-\$100 million  | <input type="checkbox"/> \$10,000,000,001-\$50 billion |
| <input type="checkbox"/> \$500,001-\$1 million   | <input type="checkbox"/> \$100,000,001-\$500 million | <input type="checkbox"/> More than \$50 billion        |

**16. Estimated liabilities**

- |  |  |  |
|--|--|--|
| <input type="checkbox"/> \$0-\$50,000          | <input checked="" type="checkbox"/> \$1,000,001-\$10 million | <input type="checkbox"/> \$500,000,001-\$1 billion     |
| <input type="checkbox"/> \$50,001-\$100,000    | <input type="checkbox"/> \$10,000,001-\$50 million           | <input type="checkbox"/> \$1,000,000,001-\$10 billion  |
| <input type="checkbox"/> \$100,001-\$500,000   | <input type="checkbox"/> \$50,000,001-\$100 million          | <input type="checkbox"/> \$10,000,000,001-\$50 billion |
| <input type="checkbox"/> \$500,001-\$1 million | <input type="checkbox"/> \$100,000,001-\$500 million         | <input type="checkbox"/> More than \$50 billion        |

**Request for Relief, Declaration, and Signatures**

**WARNING --** Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

**17. Declaration and signature of authorized representative of debtor**

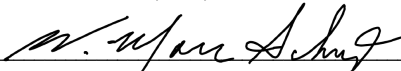
The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.

I have been authorized to file this petition on behalf of the debtor.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 04/18/2022  
MM / DD / YYYY

**x**   
 Signature of authorized representative of debtor

W. Marc Schwartz  
 Printed name

Title Chief Restructuring Officer

**18. Signature of attorney**

**x** /s/ Kyung S. Lee

Signature of attorney for debtor

Date 04/18/2022  
MM / DD / YYYY

Kyung S. Lee  
 Printed name

Parkins Lee & Rubio LLP  
 Firm name

700 Milam Street, STE 1300  
 Number Street

Houston, TX, 77002  
 City

State ZIP Code

(713) 715-1660  
 Contact phone

klee@parkinslee.com  
 Email address

121228400  
 Bar number

Texas  
 State

**CONTINUATION SHEET TO Q.10 OF VOLUNTARY PETITION**

<i>Debtor</i>	<i>District</i>	<i>Relationship</i>	<i>Date of Filing</i>	<i>Case Number</i>
IWHealth, LLC	S.D. of Texas	Affiliate	04/18/2022	Unknown

Fill in this information to identify the case:

Debtor name Prison Planet TV, LLC

United States Bankruptcy Court for the:

Southern District of Texas

Case number (if known): \_\_\_\_\_

☐ Check if this is an amended filing**Official Form 204****Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders****12/15**

A list of creditors holding the 20 largest unsecured claims must be filed in a Chapter 11 or Chapter 9 case. Include claims which the debtor disputes. Do not include claims by any person or entity who is an *insider*, as defined in 11 U.S.C. § 101(31). Also, do not include claims by secured creditors, unless the unsecured claim resulting from inadequate collateral value places the creditor among the holders of the 20 largest unsecured claims.

	Name of creditor and complete mailing address, including zip code	Name, telephone number, and email address of creditor contact	Nature of the claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of unsecured claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
					Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
1	Carlee Soto-Parisi c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 336-4421 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown
2	Carlos Soto c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 662-9065 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown
3	Dona Soto c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 662-9065 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown
4	Erica Lafferty c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 662-9065 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown
5	Francine Wheeler c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 662-9065 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown
6	Ian Hockley c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 662-9065 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown
7	Jacqueline Barden c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 662-9065 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown
8	Jennifer Hensel c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 662-9065 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown

Debtor Prison Planet TV, LLC  
Name \_\_\_\_\_

Case number (if known) \_\_\_\_\_

	Name of creditor and complete mailing address, including zip code	Name, telephone number, and email address of creditor contact	Nature of the claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of unsecured claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
					Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
9	Jeremy Richman c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 662-9065 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown
10	Jillian Soto c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 662-9065 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown
11	Mark Barden c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 662-9065 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown
12	Nicole Hockley c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 662-9065 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown
13	Robert Parker c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 662-9065 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown
14	William Sherlach c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 662-9065 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown
15	William Aldenberg c/o Koskoff Koskoff & Bieder 350 Fairfield Ave Bridgeport, CT 06604	Christopher Mattei (203) 662-9065 cmattei@koskoff.com	Litigation claim	Disputed Unliquidated			Unknown
16							
17							
18							
19							
20							

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
VICTORIA DIVISION**

In re:	)	
	)	
PRISON PLANET TV, LLC	)	Case No. 22 - _____
	)	
Debtor.	)	Chapter 11 (Subchapter V)

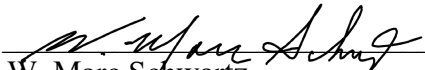
**LIST OF EQUITY SECURITY HOLDERS**

<i>Registered Name of Holder of Security, Last Known Address or Place of Business</i>	<i>Class of Security</i>	<i>Number Registered</i>	<i>Kind of Interest</i>
Robert Dew, Trustee 3019 Alvin Devane Blvd., Suite 300 Austin, TX 78741	Common Equity	100%	Membership Interests

**DECLARATION UNDER PENALTY OF PERJURY  
ON BEHALF OF A CORPORATION OR PARTNERSHIP**

I, the Chief Restructuring Officer of the limited liability company named as the debtor in this case, declare under penalty of perjury that I have read the foregoing list and that it is true and correct to the best of my information and belief.

Date: 4/18/2022

Signature:   
W. Marc Schwartz

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
VICTORIA DIVISION**

In re:	)	
	)	
INFOW, LLC	)	Case No. 22 - _____
	)	
Debtor.	)	Chapter 11 (Subchapter V)
In re:	)	
	)	
IWHEALTH, LLC	)	Case No. 22 - _____
	)	
Debtor.	)	Chapter 11 (Subchapter V)
In re:	)	
	)	
PRISON PLANET TV, LLC	)	Case No. 22 - _____
	)	
Debtor.	)	Chapter 11 (Subchapter V)

**DECLARATION OF W. MARC SCHWARTZ REGARDING  
BANKRUPTCY CODE § 1116(1) REQUIREMENTS**

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I, W. Marc Schwartz, hereby declare as follows:

1. My name is W. Marc Schwartz.
2. I am a founder of Schwartz & Associates, LLC (“SALLC”). SALLC has its principal offices at 712 Main Street, Suite 1830, Houston, Texas. SALLC has been engaged in business since 2019. The primary business of SALLC is bankruptcy and financial restructuring consulting, serving as financial/economic experts in civil litigation matters and, serving as court appointed receivers in federal and state court matters. The firm is also licensed as an Investigations Company by the Texas Department of Public Safety.
3. SALLC’s services include financial forensics, supervising business operations as a trustee, examiner with expanded powers or receiver, valuing business assets and income tax related services. My firm represents individuals, companies and

courts in a variety of assignments including as Chief Restructuring Officers, financial advisers, trustees and examiners in bankruptcy matters; working as testifying or consulting experts on damages and economic issues for parties involved in litigation and as a special master for courts where litigation matters are pending; serving as court appointed receivers in state and federal courts.

4. I earned a Bachelor of Arts degree from Princeton University and a Master's in Business Administration degree from the University of Chicago Booth School of Business. I am licensed in Texas as a Certified Public Accountant, Certified in Financial Forensics by the American Institute of Certified Public Accountants, a Certified Fraud Examiner, and a Licensed Private Investigator.

5. I have extensive experience serving as a fiduciary in bankruptcy cases as either a Chapter 11 Trustee, a Chief Restructuring Officer, or an Examiner with expanded powers. I have also acted as a receiver over several individuals and entities under state law.

6. I was retained as of April \_\_, 2022 by the Trustee of the Litigation Settlement Trust formed by InfoW, Inc. ("InfoW"), IWHealth, LLC ("IWH") and Prison Planet TV, LCC ("PTV", and together with the InfoW, IWH, and PTV, the "Debtors") as the Debtors' Chief Restructuring Officer.

7. Since my retention, I have met with Bob Roe, a CPA retained to delve into the books of account of various entities affiliated with the Debtors and assist those entities to prepare accurate financials statements which could be relied upon by the reader to accurately reflect the financial condition and activities of the entities. I have also met with counsel for the Debtors and Mr. Jones to obtain an understanding of the Debtors' operations. I have also reviewed lists of assets owned by the Debtors.



8. I have learned that the Debtor's have no purpose other than to hold assets which may be used by other entities. They undertake no business activities, they do not sell, rent or lease to others anything. Their assets do not generate any income for them. They have no bank accounts and do not pay money to anyone for any reason. They have no debt or other liabilities other than those related to pending or potential litigation. For these reasons, they have no financial statements or books of account and they do not file income tax returns.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: 04/18/2022

By:   
W. Marc Schwartz

**WRITTEN CONSENT OF THE MEMBERS OF PRISON PLANET TV, LLC**

The undersigned, comprising all of the members of Prison Planet TV, LLC (the "Company"), a Texas limited liability company, hereby declares that, upon execution of this document, they consent and resolve as follows:

RESOLVED, that the Company is authorized to file a petition for chapter 11 bankruptcy relief;

RESOLVED FURTHER, that W. Marc Schwartz in his role as a consultant to the Company serving as Chief Restructuring Officer is authorized, empowered, and directed to take all appropriate actions for, in the name of, and on behalf of the Company in connection with any chapter 11 case authorized hereby, including the preparation, execution, and filing of a petition for chapter 11 relief; and

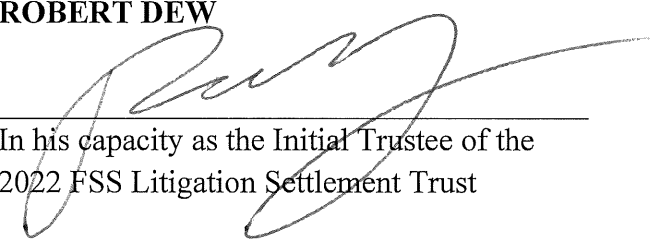
RESOLVED FURTHER; that the Company is authorized to continue the employment of the CRO and to retain any professionals and advisors to the extent necessary or useful in any chapter 11 case authorized hereby.

IN WITNESS WHEREOF, the undersigned, being all of the members of the Company, have executed this Consent.

Dated:

April 14, 2022

**ROBERT DEW**

  
In his capacity as the Initial Trustee of the  
2022 FSS Litigation Settlement Trust

# **Exhibit D**

NO. X06-UWY-CV-18-6046436 S :	SUPERIOR COURT
ERICA LAFFERTY, ET AL :	COMPLEX LITIGATION DOCKET
V. :	AT WATERBURY
ALEX EMRIC JONES, ET AL :	APRIL 18, 2022
<hr/>	
NO. X06-UWY-CV-18-6046437 S :	SUPERIOR COURT
WILLIAM SHERLACH :	COMPLEX LITIGATION DOCKET
V. :	AT WATERBURY
ALEX EMRIC JONES, ET AL :	APRIL 18, 2022
<hr/>	
NO. X06-UWY-CV-18-6046438 S :	SUPERIOR COURT
WILLIAM SHERLACH, ET AL :	COMPLEX LITIGATION DOCKET
V. :	AT WATERBURY
ALEX EMRIC JONES, ET AL :	APRIL 18, 2022
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**AFFIDAVIT PURSUANT TO PRACTICE BOOK § 14-1 IN SUPPORT OF NOTICE  
AND SUGGESTION OF BANKRUPTCY**

I, Cameron Atkinson, being duly sworn, do hereby depose and state as follows:

1. I am over the age of 18 and understand and believe in the obligation of an oath.
2. I am counsel for the Defendants – Infowars, LLC; Infowars Health, LLC; and Prison Planet TV, LLC – in the above captioned matters.
3. I give this affidavit pursuant to Connecticut Practice Book § 14-1 in support of the Defendants’ – Infowars, LLC; Infowars Health, LLC; and Prison Planet TV, LLC – notice and suggestion of bankruptcy.
4. On April 18, 2022, counsel for the Defendants – Infowars, LLC; Infowars Health, LLC; and Prison Planet TV, LLC – in the United States Bankruptcy Court for the Southern District of Texas informed me that the Defendants – Infowars, LLC; Infowars Health, LLC; and Prison Planet TV, LLC – had voluntarily petitioned for Chapter 11 bankruptcy.

5. To that end, the aforementioned counsel for the Defendants – Infowars, LLC; Infowars Health, LLC; and Prison Planet TV, LLC – provided me copies of the voluntary petitions for Chapter 11 bankruptcy and the corresponding docket numbers in the United States Bankruptcy Court for the Southern District of Texas.
6. I have independently verified both the docket numbers and the petitions using PACER.gov.
7. Pursuant to Practice Book 14-1, I provide the following information on behalf of Infowars, LLC:

**Date Petition Was Filed:** April 18, 2022

**Court & Court's Address:**

United States Bankruptcy Court for the Southern District of Texas

312 S. Main,

Victoria, TX 77901

**Name of Bankruptcy Debtor:** InfoW, LLC (f/k/a Infowars, LLC)

**Bankruptcy Case Number:** 22-60020

8. Pursuant to Practice Book 14-1, I provide the following information on behalf of Infowars Health, LLC:

**Date Petition Was Filed:** April 18, 2022

**Court & Court's Address:**

United States Bankruptcy Court for the Southern District of Texas

312 S. Main,

Victoria, TX 77901

**Name of Bankruptcy Debtor:** IWHealth, LLC (f/k/a Infowars Health, LLC)

**Bankruptcy Case Number:** 22-60021

9. Pursuant to Practice Book 14-1, I provide the following information on behalf of Prison Planet TV, LLC:

**Date Petition Was Filed:** April 18, 2022

**Court & Court's Address:**

United States Bankruptcy Court for the Southern District of Texas

312 S. Main,

Victoria, TX 77901

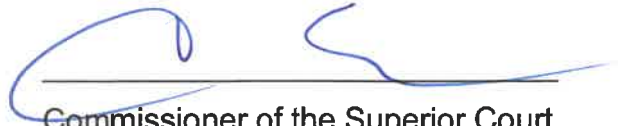
**Name of Bankruptcy Debtor:** Prison Planet TV, LLC

**Bankruptcy Case Number:** 22-60022

Cameron L. Atkinson

Cameron Atkinson

Subscribed and sworn to before me, this 18<sup>th</sup> day of April, 2022



Commissioner of the Superior Court

Juris No.: 431756